

LAW OFFICES OF MARC G. ALSTER, LLC  
Two University Plaza, Suite 311  
Hackensack, New Jersey 07601  
(201) 883-1190  
Attorney(s) for Debtor

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IN RE: : UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
:  
SOPHIA A. CYRWUS : CHAPTER 13  
:  
CASE NO.: 19-30296-RG  
:  
HEARING DATE: February 16, 2022  
Debtor(s). : HEARING TIME: 10:00 a.m.  
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NOTICE OF MOTION TO PERMIT AND APPROVE THE DEBTORS' SALE OF REAL  
PROPERTY LOCATED AT 60-62 PASSAIC STREET, PASSAIC, NEW JERSEY FREE AND  
CLEAR OF ALL LIENS.

TO:

Marie-Ann Greenberg, Ch. 13 Trustee  
30 Two Bridges Road, Suite 230  
Fairfield, New Jersey 07004

Jonathan C. Schwalb, Esq.  
Attorney for Mortgage Company, SN Servicing Corp.  
Friedman Vartolo, LLP  
85 Broad Street, Suite 501  
New York, New York 10004

Laura Munzer, Esq.  
Real Estate Attorney for debtor  
241 Hudson Street  
Hackensack, New Jersey 07601

Benjamin A. Stanziale, Esq.  
Estate Attorney for administratrix, Helen Stern  
Stanziale & Stanziale, P.C.  
29 Northfield Avenue, Suite 201  
West Orange, New Jersey 07052

Stephen G. Herold, Realtor  
Herold Real Estate & Appraisal Companies  
480 Passaic Street  
Hackensack, New Jersey 07601

Synchrony Bank - creditor  
c/o PRA Receivables Management, LLC  
P.O. Box 41021  
Norfolk, VA 23541

Discover Bank  
c/o Pressler & Pressler, LLP  
Attorney for secured creditor/judgment lien holder  
7 Entin Road  
Parsippany, New Jersey 07054

Midland Funding, LLC  
c/o Pressler & Pressler, LLP  
Attorney for secured creditor/judgment lien-holder  
7 Entin Road  
Parsippany, New Jersey 07054

Melissa Wilson, Bankruptcy Specialist  
Discover Bank - secured creditor/judgment lien holder  
P.O. Box 3025  
New Albany, OH 43054-3025

Angela Dery, Bankruptcy Specialist  
Midland Credit Management, Inc. – secured creditor/judgment lien holder  
P.O. Box 2011  
Warren, MI 48090

To the Chapter 13 Trustee, all secured creditors listed on the debtor's bankruptcy petition and all creditors who filed notice of appearance and/or request for service of papers on this case.

PLEASE TAKE NOTICE that on February 16, 2022, at 10:00 a.m. or as soon thereafter as this matter may be heard at the United States Bankruptcy Court, located at 50 Walnut Street, Newark, New Jersey, the undersigned attorney for the debtor, Sophia A. Cyrwus, will apply for an Order directing as follows:

1. Authorizing the sale of the debtor's real property located at 60-62 Passaic Street, Passaic, New Jersey 07055 (pursuant to 11 U.S.C. Section 363) free and clear of all liens;
2. Authorizing payment of all supplemental Chapter 13 attorney fees previously and/or simultaneously ordered by the U.S. Bankruptcy Court for supplemental services provided on behalf of the debtor by the Law Offices of Marc G. Alster, LLC.
3. For an Order directing that upon the sale of the debtor's said real property, the settlement agent at the prospective closing shall turn over to the Chapter 13 Trustee the entire balance from the proceeds of the sale necessary to pay the Chapter 13 Trustee's Balance to Complete in full pursuant to the Chapter 13 Trustee's instructions therein; after full payment is made directly from the proceeds of

the sale to the debtor's secured creditors and the debtor's reasonable closing costs are paid, including but not limited to the fees for professional services rendered on behalf of the debtor, and

4. For such relief as the Court may deem just and proper.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

Pursuant to D.N.J. LBR 9013-1(d) et seq., if you wish to contest the within motion you do not agree with the relief being requested in the within motion or if you want the Court to consider your views on the motion, then within seven (7) days prior to the scheduled hearing you or your attorney must file your responding papers in opposition to this motion explaining your position(s), and send it to:

**Clerk, United States Bankruptcy Court, 50 Walnut Street, P.O. Box 1532, Newark, New Jersey 07102.**

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above. You must also mail copies to the following:

Marie-Ann Greenberg, Esq.  
Chapter 13 Standing Trustee  
30 Two Bridges Road, Suite 230  
Fairfield, New Jersey 07004

Law Offices of Marc G. Alster, LLC  
Attorney for the debtor  
Two University Plaza, Suite 311  
Hackensack, New Jersey 07601

**IF YOU OPPOSE THE RELIEF REQUESTED HEREIN YOU SHOULD ATTEND THE HEARING CURRENTLY SCHEDULED TO BE HELD AT THE FOLLOWING TIME AND PLACE:**

Judge: The Honorable Rosemary Gambardella  
Date: February 16, 2022  
Time: 10:00 a.m.  
Place: United States Bankruptcy Court  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, New Jersey

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting relief.

Statement of Non-Necessity of Brief: The movant certifies pursuant to D.N.J. LBR 9013-2 that the within motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

Dated: January 14, 2022

/s/ Marc G. Alster

MARC G. ALSTER, ESQ.  
Attorney for Debtor